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UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

**Darko Pavlovski**

Plaintiff(s),

vs.

Case No. 24-cv-4452  
(To be assigned by Clerk of District Court)

**Frontier Airlines Inc.**

DEMAND FOR JURY TRIAL

YES ☒ NO ☐

Defendant(s).

(Enter the full name(s) of ALL defendants in  
this lawsuit. Please attach additional sheets  
if necessary).

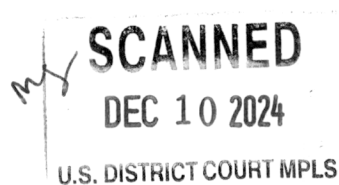
**COMPLAINT**

**PARTIES**

1. List your name, address and telephone number. Do the same for any additional plaintiffs.

a. Plaintiff

Name	<b>Darko Pavlovski in name of himself and his child F. P.</b>
Street Address	<b>5024 71st Ave. N.</b>
County, City	<b>Hennepin, Brooklyn Center</b>
State & Zip Code	<b>MN, 55429</b>
Telephone Number	<b>(952) 200-7375</b>



**RECEIVED**

**DEC 10 2024**

CLERK  
U.S. DISTRICT COURT  
MINNEAPOLIS, MINNESOTA

2. List all defendants. You should state the full name of the defendant, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption.

a. Defendant No. 1

Name	<b>Frontier Airlines Inc.</b>
Street Address	<b>2780 Snelling Avenue N, Suite 101</b>
County, City	<b>Ramsey, Roseville</b>
State & Zip Code	<b>MN, 55113</b>

b. Defendant No. 2

Name

Street Address

County, City

State & Zip Code

c. Defendant No. 3

Name

Street Address

County, City

State & Zip Code

**NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES AND ADDRESSES ON A SEPARATE SHEET OF PAPER.**

**Check here if additional sheets of paper are attached:** ☐

**Please label the attached sheets of paper to correspond to the appropriate numbered paragraph above (e.g. Additional Defendants 2.d., 2.e., etc.)**

## JURISDICTION

Federal courts are courts of limited jurisdiction. Generally, two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount of damages is more than \$75,000 is a diversity of citizenship case.

3. What is the basis for federal court jurisdiction? (*check all that apply*)



Federal Question



Diversity of Citizenship

4. If the basis for jurisdiction is Federal Question, which Federal Constitutional, statutory or treaty right is at issue? List all that apply.

**US Constitution, US Civil Code, Consumer rights, Public Policy/Safety**

5. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party? Each Plaintiff must be diverse from each Defendant for diversity jurisdiction.

Plaintiff Name: **Darko Pavlovski**

State of Citizenship: **Minnesota**

Defendant No. 1: **Frontier Airlines**

State of Citizenship: **Colorado**

Defendant No. 2:

State of Citizenship:

**Attach additional sheets of paper as necessary and label this information as paragraph 5.**

**Check here if additional sheets of paper are attached.** ☐

6. What is the basis for venue in the District of Minnesota? (*check all that apply*)



Defendant(s) reside in Minnesota



Facts alleged below primarily occurred in Minnesota



Other: explain

**Plaintiff resides in Minnesota, and for plaintiff is extrimly difficult to travel to Colorado for litigations. Also, Defendant operates businiess and has office Minnesota.**

## STATEMENT OF THE CLAIM

Describe in the space provided below the basic facts of your claim. The description of facts should include a specific explanation of how, where, and when each of the defendants named in the caption violated the law, and how you were harmed. Each paragraph must be numbered

separately, beginning with number 7. Please write each single set of circumstances in a separately numbered paragraph.

7.

**On December 11th, 2023 I my wife and our 12 months old baby were unjustly kicked out from Frontier airlines flight (Denver-Minneapolis). I carried the baby in a carrier. Upon entering Attendant B (as referred by Frontier Supervisor Pam), told me to take the baby out of the carrier and hold him. I explained that the baby is safer in the carrier as I still hold him but it's stripped to me. I also added that the pervious two flights let me have the baby in the carrier. Attendant B made threat to kick us out of airplane. I took the baby out and asked for a Child safety belt. At that poing B called someone (Supervisor Pam). Pam arrived and baby was in my lap out of the carrier. Pam attacked me for the carrier, "Why is the carrier on you, remove it!" I said, "She asked me to remove the baby and the baby is out. I'll put the baby in the carrier when we leave. What's the problem with it? It's like another jacket on me". Pam said, "Remove it!". I complied (took the carrier out of me), and again asked for a child safety belt as they give in Europe. Pam said this is not Europe and then she asked us to leave!**

**8. Later, Pam said that we got kicked out for complaining and the ultimate saying has the attendant and that we were removed due to "complaining". I responded, "So, if someone complained how their coke tastes, you'll remove them?" Pam said, "Yes, if the attendant feels we need to**

**9. Later, Frontier wanted to put us on a flight next day at 9am. It took additional 2 hours to get those tickets. That was unnecessary and a total torture for our baby. I think this was intentional prolonging just to make us suffer!**

**Attach additional sheets of paper as necessary.**

**Check here if additional sheets of paper are attached:** ☒

**Please label the attached sheets of paper to as Additional Facts and continue to number the paragraphs consecutively.**

#### **REQUEST FOR RELIEF**

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking.

**56. Prayer 1- Compensation of \$1,826.70**

**57. Prayer 2- Payment of \$51,147.60 (The same percent Frontier made me spend on Untied Airlines- multiplied by 28. I paid \$65.37 to come to Minnesota; but ended up paying 28 times more \$1,826.70)**

**58. Prayer 3-Punitive damages as determined by Jury. Frontier has all the powers in their plains and its abusing them outrageously. Frontier also has the means. The issue is of public safety and public concern.**

**59. Prayer 4- Compensation of \$300,000.00 for Pain and Suffering.**

**60. Prayer 5- Compensation if warranted, for breach of Constitutional rights of travel and freedom of movement (Article 4); Freedom of Speech, Ist and XIVth Amd., among others**

Signed this **10th** ☐ day of **Decembe**☐ <sup>2024</sup>☐

Signature of Plaintiff



Mailing Address **5024 71st Ave, N. Brooklyn Center, MN, 55429**

Telephone Number **(952) 200-7375**

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint and provide his/her mailing address and telephone number. Attach additional sheets of paper as necessary.